

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

IN RE:
Rhona P. Julien

CHAPTER 13
CASE NO. 10-22026-WCH

OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

Now Comes BAC Home Loans Servicing, LP and files its objection to the Debtor's Chapter 13 Plan. In support of its objection, BAC Home Loans Servicing, LP states as follows:

1. BAC Home Loans Servicing, LP is the holder of the first mortgage on the debtor's property located at 64 Beaumont Street, Dorchester Center (Boston), MA.
2. The mortgage to BAC Home Loans Servicing, LP is in default with a pre-petition arrearage of \$61,119.73.
3. The debtor's Chapter 13 Plan only provides for the payment of \$40,000.00 in pre-petition arrears to BAC Home Loans Servicing, LP.
4. Thus, the debtor's plan fails to provide for the payment of BAC Home Loans Servicing, LP's entire pre-petition arrearage.

WHEREFORE, BAC Home Loans Servicing, LP respectfully requests that the Court deny confirmation of the debtor's Chapter 13 Plan or for such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ Rian K. Vernon
Rian K. Vernon, Esquire
BBO# 662635
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Dated: January 21, 2011

RKK//201006-0867/Julien, Rhona

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CERTIFICATE OF SERVICE

I, Rian K. Vernon, Esquire, state that January 21, 2011, I electronically filed the foregoing Objection to Plan with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing Proof of Claim on the following CM/ECF participants:

John Fitzgerald, Esquire, Assistant U.S. Trustee
Carolyn Bankowski, Esquire, Chapter 13 Trustee
Mark W. Miller, Esquire for the Debtor

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Rian K. Vernon
Rian K. Vernon, Esquire
BBO# 662635

Rhona P. Julien
568 Eliot Street
Milton, MA 02186

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